

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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OSVALDO MUNOZ and CRISTOBAL RAMIREZ,  
*on behalf of themselves, FLSA Collective Plaintiffs,  
and the Class,*

Plaintiffs,

Case No.: 1:22-cv-04038

v.

**OFFER OF JUDGMENT**

THE GROUP US MANAGEMENT LLC, *et al*,

Defendants.

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PLEASE TAKE NOTICE that, pursuant to Rule 68 of the Federal Rules of Civil Procedure (“FRCP”), Defendants in the above-captioned action hereby make an offer of judgment to Plaintiffs to resolve all of their individual FLSA claims in the above-captioned action, in the amount of Five Thousand Dollars and Zero Cents (\$5,000.00).

Payment on the Judgment Amount shall be funded within ten (10) days of Plaintiffs’ acceptance of this Offer of Judgment. In the event of any late payment, Defendants shall be liable for a late payment penalty of five percent (5%), compounded monthly (or the highest interest rate allowed by law in the New York City), accruing automatically on any outstanding balance and no notice from Plaintiffs shall be required.

TAKE FURTHER NOTICE that, pursuant to the FRCP, within fourteen (14) days of the date this offer, Plaintiffs shall advise the undersigned, in writing via email, of their acceptance or rejection of this offer, and that failure to respond within that time shall be deemed a rejection.

This Offer of Judgment is made for the purposes specified in FRCP 68, and neither this Offer of Judgment nor any judgment that may result from this Offer of Judgment shall be construed as either an admission of liability on the part of Defendants, or any of them, or that Plaintiffs have suffered any damages.

Any evidence of this Offer of Judgment shall be inadmissible except as provided in FRCP 68.

Dated: New York, New York  
April 29, 2025

KAUFMAN DOLOWICH, LLP




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*Attorney for Defendants*

CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2025, I caused Defendants' Offer of Judgment to be served, via electronic mail, upon Plaintiffs' counsel of record in this matter:

C.K. Lee, Esq.  
Lee Litigation Group, PLLC  
148 West 24th Street, 8th Floor  
New York, NY 10011  
cklee@leelitigation.com

By:   
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Alexandra L. Robins, Esq.